SilvermanAcampora LLP Counsel to Kenneth P. Silverman, Esq., The Interim Chapter 7 Trustee 100 Jericho Quadrangle, Suite 300 Jericho, New York 11753 (516) 479-6300 Ronald J. Friedman, Esq. Rachael E. Dioguardi, Esq. UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF NEW YORK AT CENTRAL ISLIP Chapter 7 In re: Case No. 09-70660 (DTE) AGAPE WORLD, INC., Debtor.

TRUSTEE'S APPLICATION FOR ORDER FIXING LAST DAY FOR FILING PROOFS OF GAP PERIOD CLAIMS OR INTERESTS AND DESIGNATING FORM AND MANNER OF NOTICE

To: The Honorable Dorothy T. Eisenberg United States Bankruptcy Judge

The application of Kenneth P. Silverman, Esq., the interim Chapter 7 trustee (the "Trustee") of Agape World, Inc. (the "Debtor"), by his attorneys, SilvermanAcampora LLP, seeking the entry of an Order fixing the last day for filing proofs of gap period claims or interests and designating the form and manner of notice, respectfully sets forth and represents as follows:

BACKGROUND

- 1. On February 5, 2009, creditors of Agape World, Inc. filed an involuntary petition against the Debtor in accordance with Chapter 7 of Title 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Eastern District of New York, and was assigned case number 09-70660 by the Clerk of the Court.
- 2. On February 12, 2009, the Court granted a motion of the petitioning creditors to appoint an interim trustee and so directed the Office of the United States Trustee.
- 3. By Notice of Appointment dated February 12, 2009, Kenneth P. Silverman, Esq., was appointed the interim Trustee of this estate and is currently acting in that capacity.

- 4. On March 4, 2009, the Court entered an Order for Relief in this case.
- 5. The Trustee requests that pursuant to Bankruptcy Code §§105, 501 and 502 and Bankruptcy Rules 3001, et seq., that this Court fix a last day by which all claims or interests which arose during the period of February 5, 2009 and March 3, 2009 (the "Gap Period") must be filed in this case.
- 6. As set forth in the annexed Order establishing the last day by which Gap Period claims must be filed, the Trustee intends to give notice (the "Notice"), substantially in the form annexed hereto as Exhibit "A", by serving a copy of the Notice by first class mail upon all known creditors of the Debtor as of the date of this Order, including, but not limited to: (a) all persons and entities known to the Trustee that may have a claim against the estate; (b) all persons or entities that have filed a Notice of Appearances pursuant to Bankruptcy Rule 2002; (c) the principal of the Debtor; (d) counsel to the principal of the Debtor; (e) the Office of the United States Trustee; and (f) federal and state taxing authorities.
- 7. Applicant submits that the notification, as set forth above, is proper and sufficient notice pursuant to §102 of the Bankruptcy Code and in accordance with Bankruptcy Rules 2002 and 9007.
- 8. In accordance with the foregoing, Applicant submits that the entry of the annexed Order is in the best interests of the Debtor, the estate, creditors, stockholders, and other parties in interest herein.
- 9. No previous application or motion has been submitted to this or any other Court for the relief sought herein.
- 10. The Trustee respectfully requests that the requirement imposed by E.D.N.Y. LBR 9013-1(a) for the filing of a memorandum of law be dispensed with and waived at this time because no novel issues of law are presented.

WHEREFORE, Applicant requests the entry of the annexed Order establishing the last day for filing Gap Period claims or interests against the Debtor and directing notice thereof, and that the Applicant be granted such other and further relief as to this Court appears just and proper.

Dated: Jericho, New York March 19, 2009

> SilvermanAcampora LLP Attorneys for the interim Chapter 7 Trustee For the Estate of Agape World, Inc.

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